



Center for Community Action and Environmental Justice

Centro de Acción Comunitaria y Justicia Ambiental

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March 29, 2008

RE: Black and Veatch Renewable Energy Transmission Initiative Phase 1A

The Center for Community Action and Environmental Justice (CCAIEJ) must first comment on the false urgency you have placed with the less than 7 day period to comment on the 250 page RETI Phase 1A report. It appears your self imposed comment deadline only serves to stifle public participation resulting in decisions being made without the benefit of decision-makers having all the necessary information before them to ensure a well vetted decision.

CCAIEJ strongly urges you to seek generating projects as close to urban areas as possible. Undisturbed, pristine desert lands ought not even be on the table. We encourage you to develop in the following disturbed areas including but not limited to:

- Miles and miles of flat rooftops in urban areas (see http://www.pe.com/business/local/stories/PE_Biz_D_websolar.2062ee.c.html# for an example of this with Ca Governor).
- Decommissioned nuclear power plants
- Abandoned air fields
- Closed dumps
- Decommissioned military bases
- Next to urban areas
- Disturbed lands ONLY

CCAIEJ also encourages that the RETI process should use the environmental constraint layers map developed by the Center for Biological Diversity in screening for appropriate sites for the generation and transmission of renewable energy.

We are very disappointed at the treatment of environmental concerns in the draft Black and Veatch work plan -- or more accurately, the non-treatment. Throughout the work of RETI, environmental issues must be given equal consideration with economic (and other) issues if the goals of the effort are to be achieved.

- In other words, the environment cannot be "an add on."
Environmental considerations must be fully integrated.

"bringing people together to improve our social and natural environment"